

HON. ROBERT S. LASNIK

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION**

WILL CO. LTD. a limited liability company
organized under the laws of Japan,
Plaintiff,

vs.

KAM KEUNG FUNG, aka 馮錦強, aka
FUNG KAM KEUNG, aka FUNG
KAMKEUNG, aka KUENG FUNG, aka
KEUNG KAM FUNG, aka KAM-KEUNG
FUNG, aka KEVIN FUNG, an individual;
FELLOW SHINE GROUP LIMITED, a
foreign company, and DOES 1-20, d/b/a
AVGLE.COM,

Case No. 3:20-cv-05666-RSL

**DEFENDANTS' MOTION TO DISMISS
FOR LACK OF PERSONAL
JURISDICTION**

**Note on Motion Calendar:
January 15, 2021**

Oral Argument Requested

Pursuant to Fed. R. Civ. P. 12(b)(2), Defendants Kam Keung Fung ("Mr. Fung"), a resident of Hong Kong and Fellow Shine Group Limited ("FSG"), a British Virgin Islands limited liability company (collectively, Defendants), move for the dismissal of Plaintiffs' Complaint for a lack of personal jurisdiction. In support of this Motion, Defendants rely on their Memorandum of Law filed herewith.

Respectfully Submitted:

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Attorneys for Defendants

Dated: December 24, 2020

CERTIFICATE OF SERVICE

I hereby certify on the date indicated below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties who have appeared in this matter.

DATED: December 24, 2020

/s/ Philip P. Mann